



Foreign, Commonwealth
& Development Office

Wilton Park Executive Agency Framework Document 2025



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Wilton Park Executive Agency Framework Document

Contents

Introduction and background	8
1. Purpose of document	8
2. Objectives.....	8
3. Classification	8
Purposes, aims and duties.....	9
4. Purposes.....	9
5. Aims	9
Governance and accountability	11
6. Governance and accountability.....	11
Role of the FCDO and Strategy Directorate	12
7. The Foreign Secretary	12
8 The Principal Accounting Officer	12
9. The role of the sponsorship team.....	13
10. The Resolution of disputes between Wilton Park and the FCDO	14
11. Freedom of Information requests	14
12. Reporting on legal risk and litigation	14
Wilton Park governance structure	16
13. The Chief Executive	16
14. The Board	20
15. Chair's role and responsibilities	22
16. Individual board members' responsibilities	23
Management and financial responsibilities and controls.....	25
17. Delegated authorities.....	25
18. Spending authority.....	25
19. Banking and managing cash.....	26
20. Procurement	26
21. Risk management.....	27
22. Counter fraud and theft.....	27
23. Staff.....	28

Business plans, financial reporting and management information	30
24. Corporate and business plans	30
25. Estates.....	30
26. Budgeting procedures.....	33
27. Annual report and accounts.....	33
28. Reporting performance to Strategy Directorate and the FCDO	34
29. Information sharing	34
30. Dealing with the Media	35
Audit	36
31. Internal audit	36
32. External audit.....	36
Reviews and winding up arrangements	38
33. Review of Wilton Park's status.....	38
34. Arrangements in the event that Wilton Park is wound up	38
Annex A: Guidance.....	39
Annex B: Comply or explain table.....	42

Introduction and background

1. Purpose of document

- 1.1. This framework document (the “framework document”) has been agreed between the Foreign Commonwealth & Development Office and Wilton Park in accordance with HM Treasury's handbook Managing Public Money¹ (“MPM”) (as updated from time to time) and has been approved by HM Treasury.
- 1.2. The framework document sets out the broad governance framework within which Wilton Park and the FCDO operate. It sets out Wilton Park's core responsibilities; describes the governance and accountability framework that applies between the roles of the FCDO and Wilton Park; and sets out how the day-to-day relationship works in practice, including in relation to governance and financial matters.
- 1.3. The document does not convey any legal powers or responsibilities, but both parties agree to operate within its terms.
- 1.4. References to Wilton Park include all its subsidiaries and joint ventures that are classified to the public sector and central government for national accounts purposes. If Wilton Park establishes a subsidiary or joint venture, there shall be a document setting out the arrangements between it and Wilton Park agreed with the FCDO.
- 1.5. Copies of the document and any subsequent amendments have been placed in the libraries of both Houses of Parliament and made available to members of the public at <https://www.wiltonpark.org.uk/>
- 1.6. This framework document should be reviewed and updated at least every 3 years unless there are exceptional reasons that render this inappropriate that have been agreed with HM Treasury and the Principal Accounting Officer of the sponsor department. The next date for review and updating of this document is 2027.

2. Objectives

- 2.1 The FCDO and Wilton Park share the common objective of bringing the right people together in dialogue to tackle the most challenging policy issues of our time and shape the global agenda. To achieve this Wilton Park and the FCDO will work together in recognition of each other's roles and areas of expertise, providing an effective environment for Wilton Park to achieve its objectives through the promotion of partnership and trust and ensuring that Wilton Park also supports the strategic aims and objectives of the FCDO and wider government as a whole.

3. Classification

- 3.1. Wilton Park has been classified as a central government organisation by ONS/HM Treasury Classifications Team.
- 3.2. It has been administratively classified by the Cabinet Office as an executive agency².

¹[Managing public money - GOV.UK](#)

²[Executive Agencies: A guide for departments Executive Agencies: A Guide for Departments](#)

Purposes, aims and duties

4. Purposes

- 4.1. Wilton Park was established by the FCDO, previously Foreign and Commonwealth Office as an Executive Agency. It does not have a separate legal personality to the FCDO.
- 4.2. Wilton Park is a discreet forum designed for experts and policymakers to engage in genuine dialogue with a network of diverse voices, in order to address the most pressing challenges of our time.
- 4.3. Wilton Park works across the UK, around the world and virtually, leveraging global networks to convene the brightest and best minds in secure, welcoming, and expertly facilitated spaces. Today's policy influencers mix with tomorrow's leaders and new voices, bringing fresh, diverse challenge and perspectives. These dialogues create the space for debate, consensus, and the networks to drive forward change on issues of global importance. Wilton Park dialogues accelerate policy ideas, transforming them into actionable plans to shape meaningful policy change.
- 4.4. As a vital delivery resource, Wilton Park supports the strategic priorities of the FCDO and the wider UK government, acting to align and focus UK efforts. Wilton Park's networks give access to expertise from sectors including academia, global health, the military, civil society, business, politicians, and diplomats. This shared experience and ongoing collaboration creates a sense of connection to and advocacy for Wilton Park, the UK, and its allies.
- 4.5. Wilton Park is also a trusted resource for a wide range of international partners and actors keen to explore and address critical global challenges.

5. Aims

- 5.1 Wilton Park's strategic aims are:
 - Build networks of influence to address complex global challenges; and support the UK's international priorities.
 - Support the UK Government and partners in their efforts to shape an open international order that upholds stability, security and prosperity.
 - Serve as a strategic UK asset for conducting 'patient diplomacy', building links between the UK and key international partners with a 25-year time horizon.

Wilton Park will:

- Be at the forefront of shaping global policy debate. A convenor and networker, Wilton Park will enjoy an outstanding reputation for being able to bring the right individuals together at the right time, and in the right place to achieve policy impact.
- Deliver outcomes, insights and influential relationships which make a meaningful contribution to addressing the UK's foreign policy priorities.
- Build the UK's reputation for resolving international problems through dialogue.
- Build and enhance the UK's ability to engage with a network of governments, civil society organisations, and the private sector.
- Maintain contact with and develop networks of alumni, engaging with the current generation of opinion formers and policy makers and identifying and

engaging with those likely to become the successor generation of opinion formers and policy makers.

- Create and foster a strong and diverse community of investors and sponsors drawn from the private and not-for-profit sectors.

Governance and accountability

6. Governance and accountability

- 6.1 Wilton Park shall operate corporate governance arrangements that, so far as is practicable and in the light of the other provisions of this framework document or as otherwise may be mutually agreed, accord with good corporate governance practice and applicable regulatory requirements and expectations.
- 6.2 In particular (but without limitation), Wilton Park should:
- Comply with the principles and provisions of the Corporate Governance in Central Government Departments Code of Good Practice³ (as amended and updated from time to time) to the extent appropriate and in line with their statutory duties or specify and explain any non-compliance in its annual report.
 - Comply with MPM.
 - In line with MPM have regard to the relevant Functional Standards⁴ as appropriate and in particular those concerning Finance, Commercial and Counter Fraud.
 - Take into account, the codes of good practice and guidance set out in Annex A of this framework document, as they apply to ALBs.
 - Where applicable, comply with FCDO policies and procedures, including safeguarding.
- 6.3 In line with MPM Annex 3.1, Wilton Park shall provide an account of corporate governance in its annual governance statement including the Board's assessment of its compliance with the Code with explanations of any material departures. To the extent that Wilton Park does intend to materially depart from the Code, the sponsor should be notified in advance.
- 6.4 Wilton Park will also ensure conformance with the Internal Control Framework document including compliance with the three lines of defence model helping to clarify roles, responsibilities, and expectations across the organisation.

³ [Corporate governance code for central government departments 2017 - GOV.UK](#)

⁴ [Functional Standards - GOV.UK](#)

Role of the FCDO and Strategy Directorate

7. The Foreign Secretary

- 7.1 The Secretary of State for Foreign, Commonwealth & Development Affairs (the Foreign Secretary) is accountable to Parliament for all matters concerning Wilton Park. Though much of the day-to-day matters relating to the FCDO's sponsorship of Wilton Park are delegated to a Junior Minister.

Appointments to the Board

- 7.2 The Chief Executive of Wilton Park is appointed by the responsible Minister for a fixed-term 3-year contract, with the possibility of extension or permanent appointment with the agreement of all parties under the usual Senior Civil Service terms.
- 7.3 The Foreign Secretary shall have the following appointment and approval rights in relation to Wilton Park's Board:
- The chairperson is appointed by the Foreign Secretary.
 - Non-executive members are appointed by the Foreign Secretary, through open competition and on the advice of Ministers. Non-executive members of the Board are appointed for three years, renewable for a further three years. Renewal for a third and final term would be in exceptional circumstances only. Whilst Wilton Park is not subject to the Public Appointments Order in Council⁵, the appointment should seek to follow the spirit and overarching principles of the Governance Code on Public Appointments.⁶
 - All such appointments should have regard to the principle that appointments should reflect the diversity of the society in which we live, and appointments should be made taking account of the need to appoint boards which include a balance of skills and backgrounds.

Other Ministerial powers and responsibilities

- 7.4 The Foreign Secretary is also responsible for:
- The financial settlement for Wilton Park.
 - The policy framework within which Wilton Park operates.
 - Setting the performance framework within which Wilton Park will operate including approving Wilton Park's Strategy and Annual Plan.
 - Matters regarding spending approvals, acquisitions, disposals, and joint ventures in line with delegations as set out in the delegation letter.
 - Such other matters as may be appropriate and proportionate.

8 The Principal Accounting Officer

- 8.1 The Principal Accounting Officer (PAO) is the Permanent Under-Secretary of the FCDO.

PAO's specific accountabilities and responsibilities

⁵ [Public Appointments Order in Council 2025](#)

⁶ [Governance Code on Public Appointments - GOV.UK](#)

- 8.2 The PAO of the FCDO designates the Chief Executive as Wilton Park's Accounting Officer (AO) and ensures that they are fully aware of their responsibilities. The PAO issues a letter appointing the AO, setting out their responsibilities and delegated authorities.
- 8.3 The respective responsibilities of the PAO and AOs for ALBs are set out in Chapter 3 of MPM.
- 8.4 The PUS assigns a senior member of staff FCDO (SCS2), usually the Strategy Director, to act as Senior Responsible Officer (SRO) as the primary contact for Wilton Park. The SRO has the responsibility of ensuring that the FCDO and Wilton Park have a clear understanding of each other's objectives, methods of working, and effective collaboration. The SRO will be supported in their functions by officials within Strategy Directorate, who will act as the sponsorship team. The SRO will keep the Chair and Chief Executive informed of any central policy developments that might affect Wilton Park. The SRO will also be responsible for advising Ministers on the strategic direction of the Agency and also support the PAO on their responsibilities toward Wilton Park.
- 8.5 The PAO is also responsible, usually via the sponsorship team, for advising the Foreign Secretary on:
- An appropriate framework of objectives and targets for Wilton Park in the light of the FCDO's wider strategic aims and priorities.
 - An appropriate budget for Wilton Park in the light of the sponsor department's overall public expenditure priorities.
 - How well Wilton Park is achieving its strategic objectives and whether it is delivering value for money.
 - The exercise of the Ministers' statutory responsibilities concerning Wilton Park as outlined above.
- 8.6 The PAO via the sponsorship team is also responsible for ensuring arrangements are in place to:
- Monitor Wilton Park's activities and performance.
 - Address significant problems in Wilton Park, making such interventions as are judged necessary.
 - Periodically and at such frequency as is proportionate to the level of risk carry out an assessment of the risks both to the FCDO and Wilton Park's objectives and activities in line with the wider departmental risk assessment process.
 - Inform Wilton Park of relevant government policy in a timely manner.
 - Bring ministerial or departmental concerns about the activities of Wilton Park to the full (ALB) board, and, as appropriate to the FCDO Departmental Board, requiring explanations and assurances that appropriate action has been taken.

9. The role of the sponsorship team

- 9.1 The Strategy Directorate is the primary contact for Wilton Park. The responsible senior civil servant for this relationship is the Strategy Director. They are the main source of advice to the Foreign Secretary on the discharge of their responsibilities in respect of Wilton Park. They also support the PAO on their responsibilities toward Wilton Park.
- 9.2 Officials of the Strategy Directorate in the FCDO will liaise regularly with Wilton Park officials to review performance against plans, achievement against targets and

expenditure against its Departmental Expenditure Limits (DEL) and Annually Managed Expenditure (AME) allocations. Strategy Directorate will also take the opportunity to explain wider policy developments that might have an impact on Wilton Park.

- 9.3 The FCDO will also help develop and maintain institutional links and promote co-operation with overseas organisations. Where appropriate, Partners Across Government (PAGs) may be asked to help develop and maintain institutional links and promote cooperation with relevant organisations or bodies. The Strategy Directorate within the FCDO will be the principal Department within the FCDO responsible for managing the overall FCDO relationship with Wilton Park. Wilton Park staff will liaise directly with FCDO Directorates and Posts over specific programmes, and conferences.

Further detail is set out in the Internal Ways of Working document.

10. The Resolution of disputes between Wilton Park and the FCDO

- 10.1 Any disputes between the FCDO and Wilton Park will be resolved in as timely a manner as possible. The FCDO and Wilton Park will seek to resolve any disputes through an informal process in the first instance⁷. If this is not possible, then a formal process, overseen by the SRO, will be used to resolve the issue. Failing this, the senior sponsor will ask the relevant policy Director General to oversee the dispute. They may then choose to ask the Permanent Secretary to nominate a non-executive member of the FCDO's Board to review the dispute, mediate with both sides and reach an outcome, in consultation with the Secretary of State.
- 10.2 The Internal Event Agreement between the FCDO and Wilton Park contributes to simplifying the FCDO and Wilton Park workings.

11. Freedom of Information requests

- 11.1 Where a request for information is received by either party under the Freedom of Information Act 2000, or the Data Protection Act 1998 or 2018, the party receiving the request will consult with the other party prior to any disclosure of information that may affect the other party's responsibilities.

12. Reporting on legal risk and litigation

- 12.1 Wilton Park shall provide a quarterly written update to the sponsor on the existence of any active litigation and any threatened or reasonably anticipated litigation. The parties acknowledge the importance of ensuring that legal risks are communicated appropriately to the sponsor in a timely manner.
- 12.2 In respect of each substantial piece of litigation involving Wilton Park, the parties will agree a litigation protocol which will include specific provisions to ensure appropriate and timely reporting on the status of the litigation and the protection of legally privileged information transmitted to the sponsor to facilitate this. Until such time as a protocol is agreed, the parties will ensure that:
- Material developments in the litigation are communicated to the sponsor in an appropriate and timely manner.
 - Legally privileged documents and information are clearly marked as such.
 - Individual employees handling the legally privileged documents are familiar

⁷ [Partnerships with arm's length bodies: code of good practice - GOV.UK](#)

- with principles to which they must adhere to protect legal privilege.
- Circulation of privileged information within government occurs only as necessary.

12.3 Wilton Park may use the FCDO's legal services as required.

Wilton Park governance structure

13. The Chief Executive

Responsibilities of Wilton Park's Chief Executive as accounting officer

- 13.1 The Chief Executive as AO is personally responsible for safeguarding the public funds for which they have charge; for ensuring propriety, regularity, value for money and feasibility in the handling of those public funds; and for the day-to-day operations and management of Wilton Park. In addition, they should ensure that Wilton Park as a whole is run on the basis of the standards, in terms of governance, decision-making and financial management, that are set out in Box 3.1 of MPM. These responsibilities include the below and those that are set out in the AO appointment letter issued by the PAO of the sponsor department.

Responsibilities for accounting to Parliament and the public

- 13.2 Responsibilities to Parliament and the public include:
- Signing the accounts and ensuring that proper records are kept relating to the accounts and that the accounts are properly prepared and presented in accordance with any directions issued by the Secretary of State.
 - Preparing and signing a Governance Statement covering corporate governance, risk management and oversight of any local responsibilities, for inclusion in the annual report and accounts.
 - Ensuring that effective procedures for handling complaints about Wilton Park in accordance with Parliamentary and Health Service Ombudsman's Principles of Good Complaint Handling are established and made widely known within Wilton Park and published on <https://www.wiltonpark.org.uk/>
 - Acting in accordance with the terms of MPM and other instructions and guidance issued from time to time by the FCDO, the Treasury and the Cabinet Office.
 - Ensuring that as part of the above compliance they are familiar with and act in accordance with:
 - Any governing legislation.
 - This framework document.
 - Any elements of any settlement letter issued to the FCDO that is relevant to the operation of Wilton Park.
 - Any separate settlement letter that is issued to Wilton Park from the sponsor department.
 - Ensuring they have appropriate internal mechanisms for monitoring, governance and external reporting regarding non-compliance with any conditions arising from the above documents.
 - Giving evidence, normally with the PAO, when summoned before the Public Accounts Committee on Wilton Park's stewardship of public funds.

Responsibilities to Strategy Directorate and the FCDO

13.3 Responsibilities to the FCDO include:

- Establishing, in agreement with the FCDO, Wilton Park's corporate and business plans in the light of the FCDO's wider strategic aims and agreed priorities.
- Informing the FCDO of progress in helping to achieve the FCDO's policy objectives and in demonstrating how resources are being used to achieve those objectives.
- Ensuring that timely forecasts and monitoring information on performance and finance are provided to the FCDO; that the FCDO is notified promptly if over or under spends are likely and that corrective action is taken; and that any significant problems whether financial or otherwise, and whether detected by internal audit or by other means, are notified to the FCDO in a timely fashion.
- Actively supporting the recruitment on public appointments.
- Use a risk register and regularly engage-with the FCDO risk team.

Responsibilities to the board

13.4 The Chief Executive is responsible for:

- Advising the Board on the discharge of their responsibilities as set out in this document, any relevant legislation and in any other relevant instructions and guidance that may be issued from time to time.
- Advising the Board on Wilton Park's performance compared with its aim[s] and objectives.
- Ensuring that financial considerations are taken fully into account by the Board at all stages in reaching and executing its decisions, and that financial appraisal techniques are followed.

Managing conflicts

13.5 In executive agencies, final decisions, responsibility and accountability rest with the Chief Executive as accounting officer. However, the expectation is that the Chief Executive will follow the advice of the Board.

13.6 If the Board, or its chairperson, is contemplating a course of action involving a transaction which the Chief Executive considers would infringe upon the requirements of propriety or regularity or does not represent prudent or economical administration, efficiency or effectiveness, is of questionable feasibility, or is unethical the chief executive in their role as AO should reject that course of action.

13.7 The Chief Executive must ensure that the Board have a full opportunity to discuss the rationale. The Chief Executive should confirm the rationale for not following the advice of the Board in writing to the Chair of the Board and the Principal Accounting Officer and copy that to the Treasury Officer of Accounts.

13.8 If the responsible Minister agrees with the proposed course of action of the Board, it may be appropriate for the Minister to direct the AO in the manner as set out in MPM paragraph 3.6.6 onwards.

Accountability of the Chief Executive and SMT

13.9 In matters of day to day tasking and line management, the Chief Executive reports to the Chair, who will work closely with the SRO on the strategic direction of Wilton Park in the context of wider FCDO or cross-governmental policy priorities. In terms of long-term objective-setting and personnel issues such as recruitment and appraisals, the Chief Executive will be accountable to the SRO. The SRO will carry

out the necessary performance appraisal of the Chief Executive on behalf of the department.

- 13.10 As Accounting Officer, the Chief Executive is personally responsible for managing Wilton Park efficiently and effectively and reporting to the SRO at the FCDO accurately, meaningfully and without misleading. This includes ensuring a robust system of internal control is in place and operating as intended to manage risks and deliver objectives.
- 13.11 The Chief Executive will appoint the Senior Management Team (SMT) which will provide a forum to consult senior staff on performance and strategy; help in resolving management issues; contribute to financial and business planning and develop fundraising and marketing strategies.
- 13.12 The Wilton Park SMT will consult closely with the FCDO Directorates, Posts and other Government Departments in the course of developing relevant programmes and will propose events that are closely aligned to the HMG's foreign policy, and to respective departmental priorities. Where appropriate, FCDO posts will also help to identify and recruit speakers and participants, to disseminate event publicity material and support when events are held in-country. The SMT will inform the FCDO Directorates, Posts and Departments of the results, and the participants in attendance. The SMT will make available information upon specific request from Posts from their alumni database so Posts can better build on these relationships.

14. The Board

Composition of the Board

- 14.1 Wilton Park will have a board in line with good standards of corporate governance, the guidance as set out in Annex A and any relevant legislation. The role of the Board shall be to provide strategic direction for Wilton Park, to support the leadership, provide oversight and monitor effectiveness, deliver the objectives, in accordance with the purposes as set out above, their regulatory, common-law duties and their responsibilities under this framework document. Detailed responsibilities of the Board shall be set out in the Board terms of reference. Remuneration of the Board will be disclosed in line with the guidance in the Government Financial Reporting manual (FReM)⁸.
- 14.2 The Board will consist of a chairperson, together with the Chief Executive and executive members that have a balance of skills and experience appropriate to directing Wilton Park's business. For Wilton Park there should be members who have experience of business, operational delivery, corporate services such as HR, finance, technology, property asset management, estate management, communications and performance management. The Board should include four independent non-executive members (plus a Chair), and up to four further non-executives from across HMG, to ensure that executive members are supported and constructively challenged in their role. The Wilton Park Finance Director will attend all Board meetings and provide a financial update.

Board Committees

- 14.3 The Board may set up such committees as necessary for it to fulfil its functions. As is detailed below at a minimum this should include an Audit and Risk Assurance Committee (ARAC) chaired by an independent and appropriately qualified non-

⁸ [Guidance on annual reports and accounts - GOV.UK](#)

executive member of the Board.

- 14.4 While the Board may make use of committees to assist its consideration of appointments, succession, audit, risk and remuneration it retains responsibility for, and endorses, final decisions in all of these areas. The Chair should ensure that sufficient time is allowed at the board for committees to report on the nature and content of discussion, on recommendations, and on actions to be taken.
- 14.5 Where there is disagreement between the relevant committee and the Board, adequate time should be made available for discussion of the issue with a view to resolving the disagreement. Where any such disagreement cannot be resolved, the committee concerned should have the right to report the issue to the FCDO, PAO and Foreign Secretary. They may also seek to ensure the disagreement or concern is reflected as part of the report on its activities in the annual report.
- 14.6 The Chair should ensure board committees are properly structured with appropriate terms of reference. The terms of each committee should set out its responsibilities and the authority delegated to it by the Board. The Chair should ensure that committee membership is periodically refreshed and that individual independent non-executive directors are not over-burdened when deciding the chairs and membership of committees.

Duties of the Board

- 14.7 The Board is specifically responsible for:
- Establishing and taking forward the strategic aims and objectives of Wilton Park, consistent with its overall strategic direction and within the policy and resources framework determined by the Secretary of State.
 - Providing effective leadership of Wilton Park within a framework of prudent and effective controls which enables risk to be assessed and managed.
 - Providing oversight of financial and human resources for Wilton Park to meet its objectives.
 - Reviewing management performance.
 - Ensuring that the Board receives and reviews regular financial and management information concerning the management of Wilton Park.
 - Ensuring that it is kept informed of any changes which are likely to impact on the strategic direction of Wilton Park Board or on the attainability of its targets, and determining the steps needed to deal with such changes and where appropriate bringing such matters to the attention of the Foreign Secretary and PAO via the executive team, sponsorship team or directly.
 - Ensuring that any statutory or administrative requirements for the use of public funds are complied with; that the Board operates within the limits of any statutory authority and any delegated authority agreed with the sponsor department, and in accordance with any other conditions relating to the use of public funds.
 - Ensuring that in reaching decisions, the Board takes into account guidance issued by the sponsor department
 - Ensuring that as part of the above compliance they are familiar with:
 - This framework document.
 - Any delegation letter issued to body, as set out in paragraph 17.1
 - Any elements of any settlement letter issued to the sponsor department that is relevant to the operation of the ALB.

- Any separate settlement letter that is issued to the ALB from the sponsor department.
 - That they have appropriate internal mechanisms for the monitoring, governance and external reporting regarding any conditions arising from the above documents and ensure that the chief executive and Wilton Park as a whole act in accordance with their obligations under the above documents.
 - Demonstrating high standards of corporate governance at all times, including by using the independent audit committee to help the board to address key financial and other risks.
 - Putting in place mechanisms for independent appraisal and annual evaluation of the performance of the chairperson by the independent non-executives, taking into account the views of relevant stakeholders. The outcome of that evaluation should be made available to the Foreign Secretary.
 - Determining all such other things which the Board considers ancillary or conducive to the attainment or fulfilment by Wilton Park of its objectives.
- 14.8 The Board should ensure that effective arrangements are in place to provide assurance on risk management, governance and internal control.
- 14.9 The Board should make a strategic choice about the style, shape and quality of risk management and should lead the assessment and management of opportunity and risk, that is aligned with the FCDO risk management processes. The Board should ensure that effective arrangements are in place to provide assurance over the design and operation of risk management, governance and internal control in line with the Management of Risk – Principles and Concepts (The Orange Book)⁹. The Board must set up an ARAC chaired by an independent and appropriately qualified non-executive member to provide independent advice and ensure that the FCDO's Audit and Risk Assurance Committee are provided with routine assurances with escalation of any significant limitations or concerns. The Board is expected to assure itself of the adequacy and effectiveness of the risk management framework and the operation of internal control.

15. Chair's role and responsibilities

- 15.1 The Chair is responsible for leading the board in the delivery of its responsibilities. Such responsibility should be exercised in the light of their duties and responsibilities as set out in their contract of employment/appointment letter, the priorities in the chair's letter issued to them by the FCDO, this document and the documents and guidance referred to within this document.
- 15.2 Communications between Wilton Park's Board and the Foreign Secretary should normally be through the delegated Junior Minister and Chair.
- 15.3 The chair is bound by the Code of Conduct for Board Members of Public Bodies¹⁰, which covers conduct in the role and includes the Nolan Principles of Public Life¹¹.
- 15.4 In addition, the Chair is responsible for:
- Ensuring by inclusion of monitoring and engagement with appropriate governance arrangements that the Wilton Park's affairs are conducted with probity.

⁹ [Orange Book - GOV.UK](#)

¹⁰ [Code of conduct for board members of public bodies - GOV.UK](#)

¹¹ [The Seven Principles of Public Life - GOV.UK](#)

- Ensuring that policies and actions support the Foreign Secretary's, and where relevant other Ministers', wider strategic policies and where appropriate, these policies and actions should be clearly communicated and disseminated throughout Wilton Park.

15.5 The Chair has the following leadership responsibilities:

- Formulating the Board's strategy.
- Ensuring that the Board, in reaching decisions, takes proper account of guidance provided by the Foreign Secretary or the FCDO.
- Promoting the efficient and effective use of staff and other resources.
- Delivering high standards of regularity and propriety.
- Representing the views of the board to the general public.

15.6 The Chair also has an obligation to ensure that:

- The work of the Board and its members are reviewed and are working effectively including ongoing assessment of the performance of individual board members with a formal annual evaluation and more in-depth assessments of the performance of individual board members when being considered for re-appointment.
- That in conducting assessments that the view of relevant stakeholders including employees and the sponsorship team are sought and considered.
- That the Board has a balance of skills appropriate to directing Wilton Park's business, and that all directors including the Chair and Chief Executive continually update their skills, knowledge and familiarity with Wilton Park to fulfil their role both on the Board and committees. This will include but not be limited to skills and training in relation to financial management and reporting requirements, risk management and the requirements of board membership within the public sector.
- Board members are fully briefed on terms of appointment, duties, rights and responsibilities.
- They, together with the other board members, receive appropriate training on financial management and reporting requirements and on any differences that may exist between private and public sector practice.
- The Foreign Secretary is advised of Wilton Park's needs when board vacancies arise 12 months in advance of a term ending and work with the FCDO to ensure timely recruitment in line with FCDO and Cabinet Office policy. If an existing board member resigns or stands down Wilton Park should write to the Foreign Secretary.
- There is a Board Operating Framework in place setting out the role and responsibilities of the board consistent with the Government Code of Good Practice for Corporate Governance.
- There is a code of practice for board members in place, consistent with the Cabinet Office Code of Conduct for Board Members of Public Bodies¹²

16. Individual board members' responsibilities

16.1 Individual board members should:

- Comply at all times with the Code of Conduct for Board Members of Public Bodies, which covers conduct in the role and includes the Nolan Principles of Public Life as well as rules relating to the use of public

¹² [Code of conduct for board members of public bodies - GOV.UK](https://www.gov.uk/government/publications/code-of-conduct-for-board-members-of-public-bodies)

funds and to conflicts of interest.

- Demonstrate adherence to the 12 Principles of Governance for all Public Body Non-Executive Directors as appropriate.¹³
- Not misuse information gained in the course of their public service for personal gain or for political profit, nor seek to use the opportunity of public service to promote their private interests or those of connected persons or organisations.
- Comply with the Board's rules on the acceptance of gifts and hospitality, and of business appointments.
- Act in good faith and in the best interests of Wilton Park
- Ensure they are familiar with any applicable guidance on the role of public sector non-executive directors and boards that may be issued from time to time by the Cabinet Office, HM Treasury or wider government.

¹³ [12 Principles of Governance for all Public Body NEDs - GOV.UK](#)

Management and financial responsibilities and controls

17. Delegated authorities

- 17.1 Wilton Park's delegated authorities are set out in the delegation letter attached to this framework document. This delegation letter may be updated and superseded by later versions which may be issued by the FCDO in agreement with HM Treasury.
- 17.2 In line with MPM Annex 2.2 these delegations will be reviewed on an annual basis, expected via annual budget allocation.
- 17.3 Wilton Park shall obtain the FCDO's and where appropriate HM Treasury's prior written approval before:
- Entering into any undertaking to incur any expenditure that falls outside the delegations or which is not provided for in Wilton Park's annual budget as approved by the FCDO.
 - Incurring expenditure for any purpose that is or might be considered novel or contentious, or which has or could have significant future cost implications.
 - Making any significant change in the scale of operation or funding of any initiative or particular scheme previously approved by the FCDO.
 - Making any change of policy or practice which has wider financial implications that might prove repercussive, or which might significantly affect the future level of resources required.
 - Carrying out policies that go against the principles, rules, guidance and advice in MPM.

18. Spending authority

- 18.1 Once the budget has been approved by the FCDO and subject to any restrictions imposed by statute, the Foreign Secretary's instructions, this document, HM Treasury settlement or delegation letters, Wilton Park shall have authority to incur expenditure approved in the budget without further reference to the sponsor department, on the following conditions. Wilton Park must maximise the use of publicly procured banking services (accounts with central government commercial banks managed centrally by Government Banking)
- Wilton Park shall comply with the delegations set out in the delegation letter. These delegations shall not be altered without the prior agreement of the FCDO and as agreed by HM Treasury and Cabinet Office as appropriate.
 - Within the delegations notified a core allocation of funds will be given to Wilton Park. The performance obligation of these funds is that they must be used in the delivery of events in line with the FCDO's strategic priorities. Wilton Park has discretion over how the allocation is spent if its purposes meet that obligation. This would be treated as grant income within the financial results and forms part of the financial outturn performance obligation that Wilton Park's financial outturn is within -1% / +3% of a breakeven position.
 - Wilton Park shall comply with MPM regarding novel, contentious or repercussive proposals.
 - Inclusion of any planned and approved expenditure in the budget shall not remove the need to seek formal departmental approval where any

proposed expenditure is outside the delegated limits or is for new schemes not previously agreed.

- Wilton Park shall provide the FCDO with such information about its operations, performance, individual projects or other expenditure as the FCDO may reasonably require.
- Wilton Park is required to submit a formal request and justification to the sponsor team for additional funding requirements, if beyond formal agreed allocations. FCDO will review and approve accordingly, in close consultation with Wilton Park.

19. Banking and managing cash

- 19.1 Wilton Park must maximise the use of publicly procured banking services (accounts with central government commercial banks managed centrally by Government Banking).
- 19.2 Wilton Park should only hold money outside Government Banking Service accounts where a good business case can be made for doing so and HM Treasury consent is required for each account to be established. Only commercial banks which are members of relevant UK clearing bodies may be considered for this purpose.
- 19.3 Commercial accounts where approved should be operated in line with the principles as set out in MPM.
- 19.4 The AO is responsible for ensuring Wilton Park has a banking policy as set out in MPM and ensuring that policy is complied with.

20. Procurement

- 20.1 Wilton Park shall ensure that its procurement policies are aligned with and comply with any relevant UK or other international procurement rules and in particular the Public Contracts Regulations 2015.
- 20.2 Wilton Park shall establish its procurement policies and document these in a Procurement Policy and Procedures Manual.
- 20.3 In procurement cases where Wilton Park is likely to exceed its delegated authority limit, procurement strategy approval for the specific planned purchase must be sought from the FCDO's Strategy Directorate.
- 20.4 Goods, services, and works should be acquired by competition. Proposals to let single-tender or restricted contracts shall be limited and exceptional, and a quarterly report explaining those exceptions should be sent to the FCDO.
- 20.5 Procurement by Wilton Park of works, equipment, goods, and services shall be based on, a full option appraisal and value for money (VfM), i.e. the optimum combination and whole life costs and quality (fitness for purpose).
- 20.6 Wilton Park shall:
- Engage fully with department and government wide procurement initiatives that seek to achieve VfM from collaborative projects.
 - Comply with all relevant Procurement Policy Notes issued by Cabinet Office.

- Co-operate fully with initiatives to improve the availability of procurement data to facilitate the achievement of VfM.

20.7 Wilton Park shall comply with the commercial¹⁴ and grants standards¹⁵. These standards apply to the planning, delivery, and management of government commercial activity, including management of grants in all departments and ALBs, regardless of commercial approach used and form part of a suite of functional standards that set expectations for management within government.

21. Risk management

21.1 Wilton Park shall ensure that the risks that it faces are dealt with in an appropriate manner, in accordance with relevant aspects of best practice in corporate governance, and develop a risk management strategy, in accordance with the Treasury guidance Management of Risk: Principles and Concepts¹⁶.

21.2 Wilton Park shall ensure conformance with an established single, consistent risk management policy aligned to HMG standards set by The Orange Book: Management of Risk – Principles and Concepts and Managing Public Money, to support Wilton Park on a journey to strengthen its risk management to achieve greater impact. Key building blocks of Wilton Park's risk management policy include:

21.2.1 A Risk Executive Summary is produced for the Audit & Risk Assurance Committee (ARAC) meetings, supporting the ARAC to oversee and drive action on significant risks to delivery /performance and reputation.

21.2.2 The Chair of the ARAC produces a Risk Executive Summary for the Board meetings, supporting the Board to oversee and drive action on significant risks to delivery/performance and reputation.

21.2.3 A Wilton Park Risk Appetite statement, approved by the Board. This establishes Wilton Park's risk categories and how much risk we are willing to take in each area.

22. Counter fraud and theft

22.1 Wilton Park should adopt and implement policies and practices to safeguard itself against fraud and theft.

22.2 Wilton Park should act in line with guidance as issued by the Counter Fraud Function and in compliance with the procedures and considerations as set out in MPM Annex 4.9 and the Counter Fraud Functional Standard¹⁷. It should take all reasonable steps to appraise the financial standing of any firm or other body with which it intends to enter a contract or to provide grant or grant-in- aid.

22.3 Wilton Park should keep records of and prepare and forward to FCDO an annual report on fraud and theft suffered by Wilton Park and notify the FCDO of any unusual or major incidents as soon as possible. Wilton Park should also report detected loss from fraud, bribery, corruption and error, alongside associated recoveries and prevented losses, to the counter fraud centre of expertise in line with the agreed government definitions as set out in Counter Fraud Functional Standard.

¹⁴ [Government Functional Standard GovS 008: Commercial and Commercial Continuous Improvement Assessment Framework - GOV.UK](#)

¹⁵ [Government Functional Standard GovS 015: Grants - GOV.UK](#)

¹⁶ [HM Treasury - GOV.UK](#)

¹⁷ [Government Functional Standard GovS 013: Counter Fraud - GOV.UK](#)

23. Staff

Broad responsibilities for staff

- 23.1 Within the arrangements approved by the Foreign Secretary and the Treasury, Wilton Park will have responsibility for the recruitment, retention and motivation of its staff. The broad responsibilities toward its staff are to ensure that:
- The rules for recruitment and management of staff create an inclusive culture in which diversity is fully valued; appointment and advancement is based on merit; there is no discrimination against employees with protected characteristics under the Equality Act 2010 (Wilton Park is audited by the Civil Service Commission on an annual basis).
 - The level and structure of its staffing, including grading and staff numbers, are appropriate to its functions and the requirements of economy, efficiency and effectiveness
 - The performance of its staff at all levels is satisfactorily appraised and Wilton Park performance measurement systems are reviewed from time to time
 - Its staff are encouraged to acquire the appropriate professional, management and other expertise necessary to achieve Wilton Park's objectives
 - Proper consultation with staff takes place on key issues affecting them, working with the FCDO trade union if necessary
 - Adequate grievance and disciplinary procedures are in place.
 - Whistle-blowing procedures consistent with the Public Interest Disclosure Act are in place

Staff costs

- 23.2 Subject to its delegated authorities, Wilton Park shall ensure that the creation of any additional posts does not incur forward commitments that will exceed its ability to pay for them.
- 23.3 The HR budget and workforce plan is reviewed annually in line with both the People Strategy and the Business Strategy.
- 23.4 Wilton Park payroll services will be provided by the FCDO.

Pay and conditions of service

- 23.5 Wilton Park has the delegated power to determine the terms and conditions of its staff, including remuneration, but those will be in accordance with general pay structure approved by the FCDO and HM Treasury.
- 23.6 Staff terms and conditions should be set out in an Employee Handbook and the WP Policies should be available on the WP HR intranet, which should be provided to the FCDO together with subsequent amendments.
- 23.7 Wilton Park shall abide by public sector pay controls, including the relevant approvals process dependent on the organisations classification as detailed in the Senior Pay Guidance¹⁹ and the Public Sector Pay and Terms Guidance¹⁸.

¹⁸[Public Bodies: A Guide for Departments](#)

- 23.8 Wilton Park shall operate a performance-related pay scheme that shall form part of the annual aggregate pay budget approved by the FCDO, and general pay structure approved by the FCDO and the Treasury, where relevant with due regard to the Senior Pay Guidance.
- 23.9 The travel expenses of board members shall be tied to the rates allowed to senior staff of Wilton Park. Reasonable actual costs shall be reimbursed.
- 23.10 Collective bargaining and consultation will be carried out in line with employment law and recognition arrangements with the recognised trade unions as necessary.

Pensions, redundancy and compensation

- 23.11 Compensation scheme rules and pension scheme rules should reflect legislative and HM Treasury guidance requirements regarding exit payments.
- 23.12 Wilton Park staff shall normally be eligible for a pension provided by PCSPS. Staff may opt out of the occupational pension scheme provided by Wilton Park, but that employers' contribution to any personal pension arrangement, including stakeholder pension, shall normally be limited to the national insurance rebate level.
- 23.13 Any proposal by Wilton Park to move from the existing pension arrangements, or to pay any redundancy or compensation for loss of office, requires the prior approval of the FCDO. Proposals on severance must comply with the rules in chapter 4 of MPM.

Business plans, financial reporting and management information

24. Corporate and business plans

- 24.1 Wilton Park shall submit annually to the FCDO a draft of the corporate plan covering three years ahead. The draft should be submitted by the end of March each year. Wilton Park shall agree with the FCDO the issues to be addressed in the plan and the timetable for its preparation. The plan shall reflect Wilton Park's statutory and/or other duties and, within those duties, the priorities set from time to time by the Foreign Secretary (including decisions taken on policy and resources in the light of wider public expenditure decisions). The plan shall demonstrate how Wilton Park contributes to the achievement of the FCDO's medium-term plan and priorities and aligned performance metrics and milestones.
- 24.2 The first year of the corporate plan, amplified as necessary, shall form the business plan. The business plan shall be updated to include key targets and milestones for the year immediately ahead and shall be linked to budgeting information so that resources allocated to achieve specific objectives can readily be identified by the FCDO. Subject to any commercial considerations, the corporate and business plans should be published by Wilton Park on its website and separately be made available to staff.
- 24.3 The following key matters should be included in the plans:
- Key objectives and associated key performance targets for the forward years, and the strategy for achieving those objectives.
 - Key non-financial performance targets.
 - A review of performance in the preceding financial year, together with comparable outturns for the previous 3 years, and an estimate of performance in the current year.
 - Alternative scenarios and an assessment of the risk factors that may significantly affect the execution of the plan but that cannot be accurately forecast.
 - Other matters as agreed between the FCDO and Wilton Park.

25. Estates

- 25.1 The FCDO are ultimately legally and financially responsible for the lease for Wilton Park.
- 25.2 Wilton Park's estate is part of the FCDO's platform. FCDO Estates, Security and Network Directorate (ESND) is responsible for providing and maintaining a global platform that is safe, secure, flexible, and value for money to the UK taxpayer: enabling One HMG policy delivery, and keeping our people, buildings and information safe.
- 25.3 The estate is managed through the Global Asset Management Plan (GLAMP), which includes a suite of ESND interventions, including:
- Global Maintenance Programme;
 - Facilities Management contracts;
 - Worldwide Inspection Programme;
 - Sustainability Programme (delivering our Net Zero Fund);

- A nascent Accessibility Action Plan;
- Capital investment programme (acquisitions, refurb, new builds etc.).

Business as Usual

- 25.4 The FCDO delegate authority to Wilton Park to manage the leasehold estate in compliance with arrangements and obligations within the lease.
- 25.5 The Sponsor Team (Strategy Directorate) ensures that Wilton Park's estate meets the strategic needs of the FCDO for Wilton Park, providing oversight, challenge and strategic FCDO insights to support Wilton Park's use of its estate as a strategic asset.
- 25.6 Wilton Park are given an annual CDEL allocation to manage the facility – this covers minor capital works. These allocations are part of the Sponsor Team's (Strategy Directorate) budget and will be reviewed regularly in line with all FCDO spend as part of Comprehensive Spending Reviews.
- 25.7 Wilton Park funds RDEL requirements for maintenance works (pre-planned and reactive) from their revenue.
- 25.8 Wilton Park are responsible for day-to-day liaison with the Landlord on estates matters, but ESND ultimately own the relationship with the Landlord and should be kept informed of all communications – minutes of meetings should be sent to ESND and the Sponsor Team (Strategy Directorate) where available or if not available a brief note of the meeting should be sent to ESND and the Sponsor Team (Strategy Directorate), and ESND should lead (together with Strategy Directorate) any critical strategic meetings with the Landlord.
- 25.9 ESND will provide assurance of and support in the management of Wilton Park's estate to ensure that the same strategic considerations are applied across the FCDO estate and that FCDO policies and processes are followed. ESND will review Wilton Park's Strategic Asset Management Plan and forward maintenance plan. ESND will seek to ensure that monies are allocated appropriately, that Wilton Park discharge their obligations under the lease, that the landlord discharges their obligations under the lease and that we benchmark investment against other organisations. ESND is aware that delivery of maintenance and building works is influenced by a diverse range of delivery factors. If works are delayed, then we would expect Wilton Park to pull forward other prioritised works in order to drive maximum impact from the annual CDEL and RDEL budgets. ESND will work with Wilton Park to agree contingency plans in the event that works are delayed.
- 25.10 For major works (works of a more complex nature and usually > £250,000), Wilton Park will develop and submit a Project Definition Document (PDD) to ESND. The PDD asks for information on the project as follows: Rationale; Objectives & Benefits; Potential Delivery Risks & Countermeasures; Constraints or Known Issues; Dependencies and Project Delivery Options (this will include the resources needed to deliver the project - whether that is a local Project Director or an ESND Project Director and whether we need to engage professional advisers to support surveys, design and procurement of a contractor). ESND can provide support with the development of the PDD.
- 25.11 The PDD will be reviewed by ESND and if approved, the project will be added to the Capital Investment Programme. Projects on the Capital Investment Programme are prioritised for delivery against scoring criteria and relative weightings agreed by the FCDO Management Board. The FCDO Management Board will review and approve the prioritised list of projects – this is usually on an annual basis.

25.12 ESND must manage project spend in line with their annual RDEL and CDEL funding limits and therefore will plan individual project delivery timelines taking into account all the projects prioritised for delivery. This is challenging due to the multi-year nature of our projects, each of which has a pace that ebbs and flows according to diverse delivery factors. ESND will continuously analyse the projects in the Capital Investment Programme and seek to drive maximum impact (against the scoring criteria and relative weightings) from the annual CDEL and RDEL budgets.

25.13 If a Wilton Park project is on the Capital Investment Programme and is scheduled for delivery, ESND will take the lead and liaise with the Sponsor Team (Strategy Directorate) and Wilton Park, to agree the project team, governance and assurance to be established to deliver the project. The majority of projects in the capital investment programme are led by ESND but this is not always the case – a number are led by Posts.

25.14 In the event of significant strategic changes to any Wilton Park lease (including property searches, negotiation of terms, lease termination or renewal), the Sponsor Team (Strategy Directorate) will take the lead and liaise with ESND and Wilton Park to agree the project team, governance and assurance to be established to deliver the project. Examples of different projects in this field are:

- If Wilton Park is seeking to relocate, then the Sponsor Team (Strategy Directorate) would lead and be responsible for developing the business case and taking it through the approvals process. Wilton Park and ESND would provide input to the business case (ESND would input to the Commercial, Financial, Procurement and Management sections of the business cases). ESND would lead on the property searches, negotiation of terms, lease termination or renewal with support from Wilton Park.
- If Wilton Park is seeking to negotiate renewal of changes to an existing lease, then ESND would lead with support from Wilton Park.

25.15 Wilton Park is responsible for:

- Daily upkeep of their estate, with a dedicated property manager to manage it effectively;
- Keeping the estate in good order as per the terms of the lease;
- Ensuring all statutory duties, including inspections, are undertaken;
- Ensuring the relevant insurances are in place;
- Managing allocated RDEL and CDEL budgets effectively and transparently to maintain successful operations via maintenance and prioritised minor works which are supported by appropriate and considered recommendations from relevant technical reports;
- Reducing lease-related costs to the FCDO, through effective risk and maintenance management;
- Reducing estate project costs to the FCDO through effective maintenance of assets;
- Reducing security project and guarding costs to the FCDO through effective management of security behaviours of visitors and staff in accordance with the current security risk profile;
- Ensuring any day-to-day communications from the Landlord are shared with the Sponsor Team (Strategy Directorate) and ESND in a timely manner, and that issues and/or critical decisions are escalated to the Sponsor Team (Strategy Directorate) and ESND as necessary; and

- Complying with all applicable central policy, processes and submissions from Office of Government Property (OGP) or their successor bodies, working with FCDO ESND who will act to offer guidance where needed.

25.16 There will be occasions when Wilton Park is unable to absorb certain estates issues due to the complexity or the scale (insufficient budgets). In these situations, Wilton Park will:

- Flag upcoming needs to the Sponsor Team (Strategy Directorate) and ESND, with as much notice as possible;
- Work with ESND to submit a PDD for the capital investment programme outlining why the required spend is needed (why can't Wilton Park absorb the cost); what resources are required to deliver and what are the implications for the FCDO (financially or reputationally) for not addressing this issue. The PDD will need to provide evidence as to how annual RDEL and CDEL allocations have been used to mitigate the issue that has given rise to the need for a project (as per the above).

25.17 In such situations, the Sponsor Team (Strategy Directorate) will:

- Provide oversight and challenge to such requests, ensuring that value for money is achieved; and
- Ensure that the request is in line with wider FCDO priorities.

25.18 ESND will:

- Provide support on developing and submitting a PDD;
- Ensure that the Wilton Park estate is subject to the same standards, practices and due processes as any other aspect of FCDO estate;
- Prioritise projects in line with the criteria agreed by the FCDO Management Board for the FCDO platform; and
- Agree with the Sponsor Team (Strategy Directorate) and Wilton Park the project team, governance and assurance to be established to deliver major projects.

26 Budgeting procedures

26.1 Each year, in the light of decisions by the FCDO on the updated draft corporate plan, the FCDO will send to Wilton Park by the end of March each year:

- A formal statement of the annual budgetary provision allocated by the FCDO in the light of competing priorities across the FCDO and of any forecast income approved by the FCDO.
- A statement of any planned change in policies affecting Wilton Park.

26.2 The approved annual business plan will take account both of approved funding provision and any forecast receipts. It will include a budget of estimated payments and receipts together with a profile of expected expenditure and of draw-down of any departmental funding and/or other income over the year. These elements form part of the approved business plan for the year in question.

27 Annual report and accounts

27.1 The Wilton Park Board must publish an annual report of its activities together with its audited accounts after the end of each financial year. Wilton Park shall provide the FCDO with its finalised (audited) accounts by the end of each financial year in order for the accounts to be consolidated within the FCDO's accounts. A draft of the report should be submitted to the FCDO at least two weeks before the proposed publication date. The accounts should be prepared in accordance with the relevant statutes and specific accounts direction issued by the FCDO as well

as the Treasury's Financial Reporting Manual (FReM).

- 27.2 The annual report must:
- Cover any corporate, subsidiary or joint ventures under its control.
 - Comply with the FReM and in particular have regard to the illustrative statements for an executive agency.¹⁹
 - Outline main activities and performance during the previous financial year and set out in summary form forward plans.
- 27.3 Information on performance against key financial targets is included within the annual report and subject to the auditor's consistency opinion. The report and accounts shall be laid in Parliament and made available on Wilton Park's website, in accordance with the guidance in the FReM.

28 Reporting performance to Strategy Directorate and the FCDO

- 28.1 Wilton Park shall operate management, information and accounting systems that enable it to review in a timely and effective manner its financial and non- financial performance against the budgets and targets set out in the corporate and business plans.
- 28.2 Wilton Park shall inform the FCDO of any changes that make achievement of objectives more or less difficult. It shall report financial and non-financial performance, including performance in helping to deliver Ministers' policies, and the achievement of key objectives regularly.
- 28.3 Wilton Park's performance shall be reviewed by the FCDO quarterly. This will be in the accordance with Key Performance Indicators set out and reviewed at each Board²⁰ meeting. A more detailed and formal review will be undertaken every 4 years in line with the Cabinet Office ALB Review programme.
- 28.4 The Foreign Secretary, or their delegated Minister, will meet the Chair and Chief Executive once a year. The PAO will meet the Chief Executive at least once a year to discuss performance, drawing on existing monitoring and performance arrangements.

29 Information sharing

- 29.1 The FCDO has the right of access to all Wilton Park records and personnel for any purpose including, for example, sponsorship audits and operational investigations.
- 29.2 Wilton Park shall provide FCDO with such information about its operations, performance, individual projects or other expenditure as the FCDO may reasonably require.
- 29.3 The FCDO and HM Treasury may request the sharing of data held by Wilton Park in such a manner as set out in central guidance except insofar as it is prohibited by law. This may include requiring the appointment of a senior official to be responsible for the data sharing relationship.

¹⁹ [Government Financial Reporting Manual: 2020-21 - GOV.UK](#)

²⁰ Of which the FCDO is a member.

- 29.4 As a minimum, Wilton Park shall provide the FCDO with information monthly that will enable FCDO satisfactorily to monitor:
- Wilton Park's cash management,
 - forecast outturn by resource headings,
 - other data required for the Online System for Central Accounting and Reporting (OSCAR),
 - data as required in respect of its compliance with any Cabinet Office Controls pipelines or required in order to meet any condition as set out in any settlement letter.

30 Dealing with the Media

- 30.1 The Chief Executive may deal directly with the media on subjects relating to Wilton Park activities. Where media enquiries may raise issues concerning the FCDO, the Chief Executive will consult with the FCDO Head of Media Office and Digital Transformation Unit.

Audit

31 Internal audit

31.1 Wilton Park shall:

- Ensure that the sponsor department's internal audit team have complete access to all relevant records.
- Ensure that any arrangements for internal audit are in accordance with the Public Sector Internal Audit Standards (PSIAS) as adopted by HM Treasury.²¹
- Set up an audit committee of its board in accordance with the Code of Good Practice for Corporate Governance and the Audit and Risk Assurance Committee Handbook.²²
- Forward the audit strategy, periodic audit plans and annual audit report, including Wilton Park Head of Internal Audit opinion on risk management, control and governance as soon as possible to the sponsor department.
- Keep records of and prepare and forward to the FCDO an annual report on fraud and theft suffered by Wilton Park and notify the FCDO of any unusual or major incidents as soon as possible.
- Will share with the FCDO information identified during the audit process and the Annual Audit Opinion Report (together with any other outputs) at the end of the audit, in particular on issues impacting on the FCDO responsibilities in relation to financial systems within Wilton Park.

32 External audit

32.1 The Comptroller & Auditor General (C&AG) audits Wilton Park's annual accounts and passes the audited accounts to the Secretary of State who will lay the accounts together with the C&AG's report before parliament.

32.2 In the event that Wilton Park has set up and controls subsidiary companies, Wilton Park will, in the light of the provisions in the Companies Act 2006, ensure that the C&AG has the option to be appointed auditor of those company subsidiaries that it controls and/or whose accounts are consolidated within its own accounts. Wilton Park shall discuss with the FCDO the procedures for appointing the C&AG as auditor of the companies.

32.3 The C&AG:

- Will consult the FCDO and Wilton Park on whom – the NAO or a commercial auditor – shall undertake the audit(s) on their behalf, though the final decision rests with the C&AG.
 - Has a statutory right of access to relevant documents, including by virtue of section 25(8) of the Government Resources and Accounts Act 2000, held by another party in receipt of payments or grants from Wilton Park.
 - Will share with the FCDO information identified during the audit process and the audit report (together with any other outputs) at the end of the audit, in particular on issues impacting on the FCDO's responsibilities in relation to financial systems within Wilton Park.
 - Will consider requests from departments and other relevant bodies to provide regulatory compliance reports and other similar reports at the commencement of the audit. Consistent with the C&AG's independent
-

status, the provision of such reports is entirely at the C&AG's discretion.

- 32.4 The C&AG may carry out examinations into the economy, efficiency and effectiveness with which Wilton Park has used its resources in discharging its functions. For the purpose of these examinations the C&AG has statutory access to documents as provided for under section 8 of the National Audit Act 1983. In addition, Wilton Park shall provide, in conditions to grants and contracts, for the C&AG to exercise such access to documents held by grant recipients and contractors and sub-contractors as may be required for these examinations; and shall use its best endeavours to secure access for the C&AG to any other documents required by the C&AG which are held by other bodies.

Reviews and winding up arrangements

33 Review of Wilton Park's status

- 33.1 Wilton Park will be reviewed as part of the wider Public Bodies Review programme, at a time determined by the FCDO's ministers and their PAO. The date of the next review will be in 2027.

34 Arrangements in the event that Wilton Park is wound up

- 34.1 The FCDO shall put in place arrangements to ensure the orderly winding up of Wilton Park. In particular it should ensure that the assets including all staff (TUPE will apply) and liabilities of Wilton Park are passed to any successor organisation and accounted for properly. In the event that there is no successor organisation, the assets, staff payments (redundancy packages) and liabilities should revert to the sponsor department. To this end, Strategy Directorate and the FCDO shall:
- Have regard to Cabinet Office guidance on winding up of ALBs.²³
 - Ensure that procedures are in place in Wilton Park to gain independent assurance on key transactions, financial commitments, cash flows and other information needed to handle the wind-up effectively and to maintain the momentum of work inherited by any residuary body.
 - Specify the basis for the valuation and accounting treatment of Wilton Park's assets and liabilities.
 - Ensure that arrangements are in place to prepare closing accounts and pass to the C&AG for external audit, and that, for non-Crown bodies funds are in place to pay for such audits. It shall be for the C&AG to lay the final accounts in Parliament, together with his report on the accounts.
 - Arrange for the most appropriate person to sign the closing accounts. In the event that another ALB takes on the role, responsibilities, assets and liabilities, the succeeding ALB AO should sign the closing accounts. In the event that the FCDO inherits the role, responsibilities, assets and liabilities, the sponsor department's AO should sign.
- 34.2 If Wilton Park were to close, then the organisation commits to running a consultation with all staff. During the consultation process, there will be the opportunity to discuss the compensation package related to length of service. This may include a contract completion bonus that could reflect any payment that would have been due via a voluntary exit scheme for those roles considered essential to the business.
- 34.3 Wilton Park shall provide the FCDO with full details of all agreements where Wilton Park or its successors have a right to share in the financial gains of developers. It should also pass to the FCDO details of any other forms of claw-back due to Wilton Park.

²³[Public Bodies: A Guide for Departments Chapter 10 Dissolving a Public Body](#)

Annex A: Guidance

Wilton Park shall comply with the following guidance, documents and instructions:

Corporate governance

- This framework document
- Corporate Governance Code for Central Government Departments (relevant to Arm's Length Bodies) and supporting guidance:
<https://www.gov.uk/government/publications/corporate-governance-code-for-central-government-departments-2017>
- Code of conduct for Board members of Public Bodies:
<https://www.gov.uk/government/publications/code-of-conduct-for-board-members-of-public-bodies>
- Code of practice for partnerships between Departments and Arm's Length Bodies: <https://www.gov.uk/government/publications/partnerships-with-arms-length-bodies-code-of-good-practice#:~:text=This%20code%20of%20good%20practice,partnership%20approach%20to%20shaping%20relationships>.

Financial management and reporting

- Managing Public Money (MPM):
<https://www.gov.uk/government/publications/managing-public-money>
- Government Financial Reporting Manual (FReM):
www.gov.uk/government/collections/government-financial-reporting-manual-frem
- Relevant Dear Accounting Officer (DAO) letters:
www.gov.uk/government/collections/dao-letters
- Relevant guidance and instructions issued by the Treasury in respect of Whole of Government Accounts: <https://www.gov.uk/government/collections/whole-of-government-accounts>
- The most recent letter setting out the delegated authorities, issued by the parent department.

Management of risk

- Management of Risk: www.gov.uk/government/publications/orange-book and <https://www.gov.uk/government/publications/management-of-risk-in-government-framework>

- Public Sector Internal Audit Standards:
www.gov.uk/government/publications/public-sector-internal-audit-standards
- HM Treasury approval processes for Major Projects above delegated limits:
<https://www.gov.uk/government/publications/treasury-approvals-process-for-programmes-and-projects>
- The Government cyber-security strategy and cyber security guidance:
<https://www.gov.uk/government/publications/national-cyber-strategy-2022/national-cyber-security-strategy-2022> and
<https://www.gov.uk/government/collections/cyber-security-guidance-for-business>

Commercial management

- Procurement Policy Notes:
<https://www.gov.uk/government/collections/procurement-policy-notes>
- Cabinet Office spending controls:
<https://www.gov.uk/government/collections/cabinet-office-controls>
- Transparency in supply chains - a practical guide:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1040283/Transparency_in_Supply_Chains_A_Practical_Guide_2017_final.pdf

Public appointments

The following are relevant where public bodies participate in public appointments processes.

- Guidance from the Commissioner for Public Appointments:
<https://publicappointmentscommissioner.independent.gov.uk/>
- Governance Code on Public Appointments:
www.gov.uk/government/publications/governance-code-for-public-appointments
- Procurement Policy Note 08/15 – Tax Arrangements of Public Appointees:
<https://www.gov.uk/government/publications/procurement-policy-note-0815-tax-arrangements-of-appointees>

Staff and remuneration

- HM Treasury guidance on senior pay and reward:
www.gov.uk/government/publications/senior-civil-service-pay-and-reward
- Civil Service pay guidance (updated annually):
www.gov.uk/government/collections/civil-service-pay-guidance
- Public sector pay and terms:
<https://www.gov.uk/government/publications/public-sector-pay-and-terms-guidance-note>

- Whistleblowing Guidance and Code of Practice:
<https://www.gov.uk/government/publications/whistleblowing-guidance-and-code-of-practice-for-employers>
- The Equalities Act 2010: www.gov.uk/guidance/equality-act-2010-guidance

General

- Freedom of Information Act guidance and instructions:
www.legislation.gov.uk/ukpga/2000/36/contents and <https://ico.org.uk/for-organisations/guide-to-freedom-of-information/>
- The Parliamentary and Health Service Ombudsman's Principles of Good Administration: <https://www.ombudsman.org.uk/about-us/our-principles>
- Other relevant instructions and guidance issued by the central Departments (Cabinet Office and HM Treasury)
- Recommendations made by the Public Accounts Committee, or by other Parliamentary authority, that have been accepted by the Government and are relevant to Wilton Park.
- Guidance from the Public Bodies team in Cabinet Office:
www.gov.uk/government/publications/public-bodies-information-and-guidance
- The Civil Service diversity and inclusion strategy (outlines the ambition, to which Arm's Length Bodies can contribute):
<https://www.gov.uk/government/publications/civil-service-diversity-and-inclusion-strategy-2022-to-2025>
- Guidance produced by the Infrastructure and Projects Authority (IPA) on management of major projects:
www.gov.uk/government/organisations/infrastructure-and-projects-authority
- The Government Digital Service:
www.gov.uk/government/organisations/government-digital-service
- The Government Fraud, Error, Debt and Grant Efficiency function;
www.gov.uk/government/collections/fraud-error-debt-and-grants-function and
www.gov.uk/government/publications/grants-standards
- Code of Practice for Official Statistics:
<https://code.statisticsauthority.gov.uk/#:~:text=The%20Code%20of%20Practice%20for%20Statistics%20sets%20the,produced%20by%20people%20and%20organisations%20that%20are%20trustworthy.>
- Accounting Officer System Statements (AOSS are produced by departments with input from ALBs): www.gov.uk/government/publications/accounting-officer-system-statements

Annex B: Comply or explain table

No	Section / Paragraph (Paragraph no. in template)	Change from the template	Explanation of reason for change
1	4.2 (4.2)	Insertion of text on the purpose of Wilton Park rather than as a reference	The template asks for reference to specific section of an act. No such act exists, as such the purpose of the department is outlined in full here.
2	6.2 (7.2)	Insertion of requirement to comply with the FCDO policies and procedures.	This is a standard addition for FCDO ALBs.
3	6.4 (NEW -7.4)	New - Insertion of reference to the Internal Controls Framework document	Ensures join up and shared language on governance documents. The Wilton Park (WP) Internal Control Framework is a strategic document presenting our approach to internal control in a single place. It is based on the FCDO Internal Control Framework which has been adapted for WP. The Internal Control Framework describes our system of internal control, including the relationship between risk, control and assurance. It covers all WP activities and is designed to support the Chief Executive as Accounting Officer, by providing reasonable assurance that risks are being managed at an acceptable level and that our objectives are met in a way that complies with legislation and government policy; protects our staff from harm; protects UK funds from misuse; and delivers value for money.
4	7.1 (8.1)	“Though much of the day-to-day matters relating to the FCDO’s sponsorship of Wilton Park are delegated to a Junior Minister.”	Although the Foreign Secretary is the responsible Minister for Wilton Park, much of decisions on Wilton Park are dealt by a junior minister.
5	7.2 (8.3)	Further detail added on contract length.	The CEO of Wilton Park was traditionally appointed by the PUS with approval from the responsible Minister. The text is how the FCDO/Wilton Park intends to proceed with CEO appointments going forward.

6	7.3 (8.2)	Minster's powers and responsibilities with respect to Wilton Park removed	Not needed as only other Ministerial responsibility (board appointments) is in the next paragraph.
7	7.3-7.5 (8.3 – 8.4)	Changes to text with reference to <i>Order in Council</i>	Wilton Park is not a member of the Order in Council (see link)
8	7.4 (8.5)	Adds that the Foreign Secretary is responsible for the financial settlement of Wilton Park.	Given the role of the financial settlement, it is reasonable to note it somewhere, and the section on Foreign Secretary responsibilities is a sensible location. This is consistent with the template.
9	8.4 (NEW – after 9.3)	Includes text modified from the equivalent para of the 2019 Framework agreement specifying that the SRO is the Strategy Director and is appointed by the PUS	The Strategy Director (SCS2) is de facto SRO for Wilton Park.
10	9.3 (NEW – after 10.2)	Specifies the FCDO's responsibility for assisting with Wilton Park engagement, while protecting WP's right to liaise directly with posts.	This is consistent with scope of the template to allow additions on the working relationship. This addition is important for setting out a key sponsorship responsibility and protecting an important aspect of WP independence.
11	10.2 (NEW – after 11.1)	References the Internal Event Agreement.	This is in line with the instruction in the Template to reference significant supporting documents.
12	12.3 (NEW – after 13.2)	Specifies that WP can use FCDO legal services.	Reinserted from the previous Framework Agreement at Wilton Park's request.
13	13.3 (14.3)	Added bullet points on responsibilities to support public appointments and the employment of a risk register.	These were inserted to preserve important elements of the 2019 Framework specification of responsibilities not given in the Template. The text was lightly reworded to clarify the responsibilities.
14	13.9 (NEW)	Establishes the relationship between the Chief Executive and the Chair, as well as their role as appointing the SMT.	Not in the template but is deemed important in setting out basic management structures of the organisation.
15	13.10 – 13.13 (NEW)	Sets out the aspect of Senior Management Team to work with the FCDO and Other	This in some ways mirrors 9.3 but can be found here along with other CEO functions. This was added to reflect the importance of strategic alignment (re-

		Government Departments on running events aligned with objectives.	emphasised in the recent Public Body Review).
16	14.2 (15.2)	“The Board should include four independent non-executive members (plus a Chair), and up to four further non-executives from across HMG, to ensure that executive members are supported and constructively challenged in their role.”	Makes clear the number of non-executive directors and explicitly references the membership of xHMG officials.
17	14.2 (15.2)	This will include as an executive and voting board member an appropriately qualified finance director as described in Annex 4.1 of MPM.	In consultation with the Board and FCDO Finance, the decision was made for the Finance Director to not be a formal Board member though the Finance Director attends all Board meetings to provide updates.
18	14.7 (15.7)	Removal of “appointing with the Foreign Secretary’s approval a Chief Executive and, in consultation with the FCDO, set performance objectives and remuneration terms linked to these objectives for	The Board expressed disapproval for this remaining in the Framework Agreement as this would lead to dual management of the Chief Executive. The Board were in agreement that the Chief Executive should be line-managed by structures within the FCDO.

		the Chief Executive which give due weight to the proper management and use and utilisation of public resources”	
19	14.7 (15.7)	Change of wording from “ensuring the financial and human resources are in place for Wilton Park to meet its objectives” to “providing oversight of financial and human resources for Wilton Park to meet its objectives”	The original wording may have delegated an extra responsibility to the Board. Reworded language clarifies that the Board has an oversight responsibility.
20	15.1 (16.1)	Removal of “any relevant statute governing Wilton Park”	Not applicable to Wilton Park
21	15.2 (16.2)	Change of language - notes communications between Wilton Park Chair and the FCDO is delegated to a Junior Minister (rather than Foreign Secretary)	Language changed to reflect the delegation of responsibility from the Foreign Secretary to a Junior Minister

22	18.1	Addition of last bullet – “Wilton Park is required to submit a formal request and justification to the sponsor team for additional funding requirements, if beyond formal agreed allocations. FCDO will review and approve accordingly, in close consultation with Wilton Park.”	Provides language to ensure Wilton Park consults FCDO if additional funding is required.
23	23.1 (24.1)	Removal of “and in line with FCDO Policies and procedures”	Wilton Park may replicate FCDO policies, but these should be presented as Wilton Park procedures and policies.
23	23.3 (NEW – after 24.2)	The HR budget and workforce plan is reviewed annually in line with both the People and the Business Strategy.	Addition to clarify how HR Budget is decided and reviewed.
24	23.4 (NEW – after 24.2)	Wilton Park payroll services will be provided by the FCDO.	This delineates the responsibility placed on the FCDO for providing payroll services for Wilton Park (though the process through which it happens in itself is rather complicated).
25	23.5 – 23.9 (24.4 – 24.9)	Rewording of pays and conditions of service	The template wording has been altered to make it clearer that this section means Wilton Park do not have delegated authority to change their general pay structure, and related pay, terms and conditions including pension without recourse to the FCDO and, where appropriate, HMT. Wilton Park staff are not directly employed by the FCDO (other than the CEO) and aren’t subject to FCDO HR or H&S policies.
26	23.9 (NEW)	Addition of “Collective bargaining and consultation will be carried out in line with employment law and recognition arrangements with	HR addition clarifying the process of collective bargaining for Wilton Park employees.

		the recognised trade unions as necessary.”	
27	25.1 (NEW)	Specifies responsibilities on Wilton Park in regard to their lease.	Given the resource liabilities which are imposed on the department by estates-related decisions, a section on Estates is useful.
28	28.3 (28.3)	Language changed to reflect frequency of Wilton Park’s reviews	Template version suggests Wilton Park’s formally reviewed twice a year – this isn’t the case. The FCDO Strategy Director sits on the board of WP and reviews performance against KPIs on a quarterly basis, there is an annual review process and Wilton Park is reviewed in line with Cabinet Office guidelines on Public Body Reviews.
29	30.1 (NEW)	The Chief Executive may deal directly with the media on subjects relating to Wilton Park activities. Where media enquiries may raise issues concerning the FCDO, the Chief Executive will consult with the FCDO Head of Media Office and Digital Transformation Unit.	Given the use of Wilton Park for hosting several international dialogues, this ensures that Wilton Park does not speak on behalf of the FCDO.
30	33.1	Removed “The date of the next review will be in...”	The next review is to be determined by the FCDO PUS and Ministers with no agreed timeline for when this may be.
31	34.1	...that the assets including all staff (TUPE will apply) and liabilities of Wilton Park are passed to any successor organisation and accounted for properly. In the event that there is no successor organisation, the assets, staff payments (redundancy packages)...	Wilton Park HR addition - language on staff and staff payments in case of wind down.
32	34.2 [NEW]	If Wilton Park are to close, then the organisation	Wilton Pak HR addition - noting that staff will be consulted should the organisation close.

		commits to running a consultation with all staff. During the consultation process, there will be the opportunity to discuss the compensation package related to length of service. This may include a contract completion bonus that could reflect any payment that would have been due via a voluntary exit scheme for those roles considered essential to the business.	
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HM Treasury contacts

This document can be downloaded from www.gov.uk

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